#### 2 SEMI-ANNUAL MONITORING REPORT

In accordance with RLI Title V Permit Standard Conditions I.F and 19867, Part 32; BAAQMD Regulation 8-34-411; and 40 CFR §60.757(f) of the NSPS for landfills, this report is a Title V Combined Semi-Annual Report and Partial 8-34 Annual Report that is required to be submitted by RLI. This Report contains monitoring data for the operation of the gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe included in this Report is May 1, 2015 to October 31, 2015. The following table lists the rules and regulations that are required to be included in this Combined Report:

**Table 2-1 Semi-Annual Report Requirements** 

RULE	REQUIREMENT	LOCATION IN REPORT
	All collection system downtime, including individual well shutdown times and the reason for the shutdown.	Section 2.1, Appendices B & D
8-34-501.2, §60.757(f)(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendix B
8-34-501.3, 8-34-507, §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendices E & F
8-34-501.4, 8-34-505, 8-34-510	Testing performed to satisfy any of the requirements of this rule.	Sections 2.4 & 2.10, Appendices G & I
8-34-501.5	Monthly landfill gas (LFG) flow rates and well concentration readings for facilities subject to 8-34-404.	Sections 2.5 & 2.11, Appendix K
8-34-503, 8-34-506,	503, 8-34-303 that are discovered by the operator, including the location of the	
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place.	Section 2.8
8-34-501.8	Records of the nature, location, amount, and date of deposition of non- degradable wastes, for any landfill areas excluded from the collection system requirement as documented in the GCCS Design Plan.	Section 2.9
8-34-505,	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair.	Section 2.10, Appendices I & J
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate records for any site subject to Section 8-34-508.	Section 2.11, Appendix K

RULE	REQUIREMENT	LOCATION IN REPORT
	For operations subject to Section 8-34-509, records or key emission control system operating parameters.	Section 2.2.2
	The records required above shall be made available and retained for a period of five years.	Section 1.2
§60:757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.12
§60.10 (d)(5)(i)	Start-up, Shutdown, Malfunction Events	Section 4, Appendices B, D, and E

# 2.1 COLLECTION SYSTEM OPERATION [BAAQMD 8-34-501.1& §60.757(f)(4)]

Appendix A contains a map of the GCCS at RLI. Section 2.1.1 includes all collection system downtimes. The information contained in Appendix B, A-51 and A-60 Flares SSM Logs and GCCS Downtime Summary, includes the individual well shutdown times and the reason for each shutdown.

#### 2.1.1 FLARE SYSTEM DOWNTIME

The A-51 Flare commenced operation in June 2005, and the A-60 Flare commenced operation on April 1, 2009. Table 2-2 summarizes the A-51 and A-60 Flares' downtimes for the reporting period.

Table 2-2 A-51 and A-60 Downtimes

Month	A-51 Downtime (Hours)	A-60 Downtime (Hours)
May 2015	10.33	0.07
June 2015	2.10	0.00
July 2015	0.13	0.07
August 2015	0.00	0.53
September 2015	0.00	60.97
October 2015	0.00	3.97
Total Hours:	12.57	65.60

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. Appendix B contains the A-51 and A-60 Flare SSM

logs, and GCCS Downtime Summary which lists dates, times, and lengths of shutdowns for the reporting period and year-to-date.

#### 2.1.2 WELL DISCONNECTION LOG

During the reporting period, 18 wellfield SSM events occurred. In addition, 3 wells (out of a possible 5) remain disconnected at the end of the reporting period, pursuant to BAAQMD Regulation 8-32-116.2 (Limited Exemption, Well Raising).

A Wellfield SSM Log that lists dates, times, and lengths of disconnections for the reporting period is included in Appendix D.

# 2.2 EMISSION CONTROL DEVICE DOWNTIME [BAAQMD 8-34-501.2 & §60.757(f)(3)]

No bypassing of the control system or emissions of raw LFG occurred. The Flare SSM Logs that include all downtimes and reasons for each shutdown for the A-51 and A-60 Flares are contained in Appendix B. Device downtime is summarized in Table 2-3.

**Table 2-3 GCCS Downtime Summary** 

January 1, 2015 through April 30, 2015:	80.80	
May 1, 2015 through October 31, 2015:	0.07	
Total 2015 Downtime:	80.87	
2015 Downtime Percent of 240 Hours:	33.69%	

#### 2.2.1 LFG BYPASS OPERATIONS (§60.757(f)(2))

Title 40 CFR §60.757(f)(2) is not applicable at RLI because no bypass line is installed. LFG cannot be diverted around the control equipment.

### 2.2.2 KEY EMISSION CONTROL OPERATING PARAMETERS (BAAQMD 8-34-501.11 & 8-34-509)

The A-51 and A-60 Flares are subject to continuous temperature monitoring as required in BAAQMD Regulation 8-34-507 and 40 CFR §60.757(f)(1).

# 2.3 TEMPERATURE MONITORING RESULTS [(BAAQMD 8-34-501.3, 8-34-507, & §60.757(f)(1)]

The RLI has two flares used to destroy LFG collected by the GCCS (A-51 and A-60). Combustion zone temperatures of the flares are monitored with thermocouples and recorded with a Yokogawa DX100 paperless chart recorder. There were no continuous recorder device SSM events during the reporting period. As shown in Appendix F, there were no periods of missing temperature data for the flares during the reporting period.

Title V Permit Condition Number 19867 Part 22 states that the minimum combustion zone temperature shall be equal to the average combustion zone temperature determined during the most recent complying source test minus 50°F, provided that the minimum combustion zone temperature is not less than 1,400°F. Pursuant to Part 22, the following temperature limits applied during the reporting period:

**Table 2-4 Applicable Temperature Limits** 

Device	Test Date	Report Submitted	Average Temperature During Test (°F)	3-hr Minimum Temperature (°F)
A-51	2/27/2014	4/24/2014	1,509	1,459
A-51	4/2/2015	5/20/2015	1,481	1,431
A-60 Zone A	2/27/2014	4/24/2014	1,574	1,524
A-60 Zone B	2/19/2015	4/10/2015	1,538	1,488

The three-hour minimum temperature applies upon submittal of the source test report. Operating records for the flares indicate all flares operated in compliance with the applicable three-hour average minimum temperatures from May 1, 2015 to October 31, 2015.

Pursuant to Title V Permit Condition Number 19867, Part 30g, the annual source test at A-60 may be conducted while A-60 is operating in either zone, provided that each operating zone is tested at least once every five years. The most recent source test for Zone A was completed in 2014. Zone B was tested in 2015, meeting the obligation to test each zone every five years.

# 2.4 MONTHLY COVER INTEGRITY MONITORING [BAAQMD 8-34-501.3, 8-34-507, & §60.757(f)(1)]

The Monthly Cover Integrity Monitoring Reports are included in Appendix G. The cover integrity monitoring was performed on the following dates:

- May 4, 6, 7, 8, 13, 15, 19, 20, 22, and 26, 2015
- June 1, 2, 3, 4, 5, 15, and 16, 2015
- July 7, 8, 9, 10, 17, 18, 20, 21, 23, and 27, 2015
- August 3, 4, 5, 10, 11, and 18, 2015
- September 1, 2, 3, 4, and 9, 2015
- October 1, 2, 5, and 6, 2015

No breaches of cover integrity (e.g., cover cracks or exposed garbage) were found during the reporting period.

### 2.5 LESS THAN CONTINUOUS OPERATION (BAAQMD 8-34-501.5)

The RLI does not operate under BAAQMD Regulation 8-34-404 (Less Than Continuous Operation) and therefore is not required to submit monthly LFG flow rates.

# 2.6 SURFACE EMISSIONS MONITORING [BAAQMD 8-34-501.6, 8-34-506, & §60.757(f)(5)]

Quarterly Surface Emissions Monitoring (SEM), pursuant to BAAQMD Regulation 8-34-506, was conducted during the reporting period. A flame ionization detector (FID) was used during the SEM events to monitor the path along the landfill surface according to the Landfill SEM Map. Any areas suspected of having emission problems by visible observations also were monitored. Immediately prior to both monitoring events, the FID was zeroed and calibrated using zero air and a 500-ppm<sub>v</sub> methane calibration gas.

The Second Quarter 2015 SEM event was conducted by Roberts Environmental Services (RES) personnel on May 5 and 6, 2015. Nine (9) exceedances were identified on May 6, 2015. Corrective action and re-monitoring are described below:

- 5-day corrective action was completed on May 7 and 11, 2015.
- 10-day re-monitoring was completed on May 13, 2015 with all locations cleared.
- 1-month remonitoring was completed on June 4, 2015. All locations cleared.

The Third Quarter 2015 SEM was conducted by RES on July 13 and 14, 2015. Fortysix (46) exceedances were identified (40 by RES staff and 6 by RLI staff on July 14 and 20, 2015). Corrective action and re-monitoring are described below:

- 5-day corrective action was completed on July 14, 15 16, and 20, 2015.
- 10-day re-monitoring was completed on July 15, 16, 20 and 21, 2015. All locations cleared.
- 1-month remonitoring was completed August 12, 2015. All locations cleared.

SEM Reports are included in Appendix H.

### 2.7 COMPONENT LEAK TESTING [BAAQMD 8-34-501.6, 8-34-503)

Quarterly component leak testing, pursuant to BAAQMD Regulation 8-34-503, occurred during the reporting period on the following dates:

Second Quarter 2015 – May 7, 2015 Third Quarter 2015 – July 14, 2015

No exceedances were identified during either monitoring event. The Component Leak Testing results are included with the SEM reports in Appendix H.

### 2.8 SOLID WASTE PLACEMENT RECORDS (BAAQMD 8-34-501.7)

The solid waste placement total was calculated for the period of May 1, 2015 to October 31, 2015. The current waste in place figure includes solid waste placed in the landfill

through the end of the reporting period. Table 2-5 summarizes the RLI solid waste placement records for the reporting period.

Table 2-5 Solid Waste Placement

Waste Placement (May 1, 2015 to October 31, 2015)	107,453 tons
Current Waste In Place as of October 31, 2015	13.18 million

# 2.9 NON-DEGRADABLE WASTE ACCEPTANCE RECORDS (BAAQMD 8-34-501.8)

RLI does not have non-degradable waste areas that are excluded from the collection system. Therefore, BAAQMD Regulation 8-34-501.8 is not applicable.

## 2.10 WELLHEAD MONITORING DATA (BAAQMD 8-34-501.4 & 8-34-505)

Wellhead monitoring was performed on a monthly basis pursuant to BAAQMD Regulation 8-34-505. The well data for May 1, 2015 to October 31, 2015 are included in Appendix I. Each well was monitored in accordance with the following requirements:

- 8-34-305.1 Each wellhead shall operate under a vacuum.
- 8-34-305.2 The LFG temperature in each wellhead shall be less than 55 degrees Celsius (131 °F).
- 8-34-305.4 The oxygen concentration in each wellhead shall be less than 5 percent by volume.

The wellhead monitoring was performed on the following dates:

- May 4, 6, 7, 8, 13, 15, 19, 20, 22, and 26, 2015
- June 1, 2, 3, 4, 5, 15, and 16, 2015
- July 7, 8, 9, 10, 17, 18, 20, 21, 23, and 27, 2015
- August 3, 4, 5, 10, 11, and 18, 2015
- September 1, 2, 3, 4, and 9, 2015
- October 1, 2, 5, and 6, 2015

#### **WELLHEAD DEVIATIONS [BAAQMD 8-34-501.9 & §60.757(f)(1)]**

A total of 10 deviations from the wellhead standards in 8-34-305 occurred during the reporting period. All exceedances were corrected prior to issuance of this report.

The Wellfield Deviation Log is included in Appendix J.

# 2.11 GAS FLOW MONITORING RESULTS [BAAQMD 8-34-501.10, 8-34-508 & §60.757(f)(1)]

The LFG flow rates from both the A-51 and A-60 flares are measured with Veris flow meters. The flare flow meters meet the requirements of BAAQMD Regulation 8-34-508 by recording fuel flow at least every 15 minutes.

Appendix K contains a summary of the daily and monthly LFG flow rates and heat input for the flares. These flow rates are summarized in Table 2-6:

**Table 2-6 Total LFG Flow** 

Emission Control Device	Total Runtime (hours)	Average Flow Rate (scfm)	Average Methane (%) <sup>1</sup>	Total LFG Flow (scf)	Total LFG Flow (scf) Corrected to 500 BTU/scf	Total Methane Flow (scf)	Heat Input (MMBTU)
A-51	4,403	1,560	53.04	412,180,456	442,962,076	218,638,734	221,481
A-60	4,350	746	55.97	194,825,683	220,909,986	109,037,506	110,455

<sup>1</sup>Methane content was determined from the February 27, 2014, February 19, 2015, and April 2, 2015 Source Tests. Heating value of methane used in heat input calculations is 1,013 BTU/scf

scfm = standard cubic feet per minute

scf= standard cubic feet

MMBTU = million British thermal units

Pursuant to Title V Condition Number 19867, Part 20, the total LFG throughput to the A-51 Flare did not exceed 4,320,000 scf during any one day, and the total LFG throughput to the A-60 Flare did not exceed 4,320,000 scf during any one day during the reporting period of May 1, 2015 to October 31, 2015. The A-51 and A-60 Flares combined total LFG throughput did not exceed 2,207,520,000 scf during any consecutive 12-month period.

Appendix K contains a summary of the combined daily LFG flow rates for the A-51 and A-60 Flares and the consecutive 12-month summaries.

There were no periods of missing data or chart recorder non-operation for the A-51 or A-60 Flares during the reporting period. The Flare Missing Data Report Forms are included in Appendix F.

### 2.12 COMPLIANCE WITH §60.757(f)(6)

"The date of installation and the location of each well or collection system expansion added pursuant to (a)(3), (b), (c)(4) of §60.755."

Routine GCCS maintenance occurred during the reporting period. The Wellfield SSM Log is included in Appendix D, Wellfield SSM Log.

The following wells/collectors added or removed to the collection system during the reporting period (May 1, 2015 to October 31, 2015):

- Horizontal collectors RLI00090 and RLIHC163 were decommissioned on May 22, 2015,
- Vertical well RLI0101C was decommissioned on July 7, 2015.
- Vertical wells RLI00006, RLI00009, RLI00013, RLI00026, RLI00066, RLI00074, RLI00081, RLI00097, and RLI0112A were decommissioned on July 8, 2015.
- Vertical wells RLLC0164, RLLC0165, RLLC0166, RLLC0167, RLLC0168, RLLC0169, RLLC0170, RLLC0171, RLLC0172, RLLC0176, and RLLC0179 were added to the collection system on July 17, 2015.
- Vertical wells RLLC0173, RLLC0174, RLLC0175, RLLC0177, and RLLC0178 were added to the collection system on July 18, 2015.

As of the end of this reporting period, 92 total collectors (75 vertical wells and 17 horizontal collectors) were in service at RLI. A map of the LFG collection system showing the positioning of all vertical wells, horizontal collectors, and other LFG extraction devices is included in Appendix A.

## 2!13 COMPLIANCE WITH TITLE V PERMIT CONDITION 13123 (S-34 & S-39)

The S-34 Compost Facility Operations and S-39 Screening Operations were utilized during the reporting period. The total amount of material processed did not exceed 160,368 tons during any consecutive 12-month period during the reporting period of May 1, 2015 to October 31, 2015. Monthly and 12-month rolling throughputs are summarized in Table 2-7.

**Table 2-7 Composting and Screening Operations Throughput** 

Month	Total Throughput (tons)	Rolling 12-Month Throughput (tons)
May 2015	6,315	48,673
June 2015	6,569	52,168
July 2015	6,675	55,691
August 2015	6,526	59,279
September 2015	7,245	63,317
October 2015	8,209	68,063
TOTAL:	41,539	

Pursuant to Title V Permit Condition Number 13123 Part 7, all yard waste material was processed within 72 hours of receipt. In addition, pursuant to Title V Permit Condition Number 13123 Part 8, the plant received no public nuisance notices of violation during the reporting period of May 1, 2015 to October 31, 2015.

# 2.14 COMPLIANCE WITH TITLE V PERMIT CONDITIONS 14098 AND 16516 (S-55)

Pursuant to Title V Permit Condition Number 14098, the annual gasoline throughput for the S-55 Non-Retail Gasoline Dispensing Facility Number 8573 did not exceed 940,000 gallons in any consecutive 12-month period during the timeframe of this report. Monthly gasoline throughput totals for the reporting period are listed in Table 2-8:

**Table 2-8 Unleaded Gasoline Throughput** 

Month	Total Throughput (gallons)	Rolling 12-Month Fuel Usage (gallons)
May 2015	204	3,200
June 2015	230	3,230
July 2015	239	3,204
August 2015	155	3,126
September 2015	143	2,987
October 2015	139	2,772
TOTAL:	1,110	***

Pursuant to Title V Permit Condition Number 16516, the Static Pressure Performance Test (Leak Test) for S-55 was performed on April 17, 2015. S-55 passed the 2015 Leak Test. The Static Pressure Performance Test results are included in Appendix O

#### 2.15 COMPLIANCE WITH TITLE V PERMIT CONDITIONS 22820 (S-49)

The permit for S-49 was surrendered to BAAQMD on November 4, 2013. The equipment is on longer on site.

### 2.16 COMPLIANCE WITH TITLE V PERMIT CONDITION 19865 (S-41)

Pursuant to Title V Permit Condition 19865, the total of waste processed at the S-41 Yard and Green Waste Shredding Operation did not exceed 820 tons per day or 200,000 tons per year. Table 2-9 summarizes the amount of waste processed at S-41 during the reporting period:

Table 2-9 Waste Processed at S-41

Month	Total Throughput (tons)	Rolling 12-Month Throughput (tons)
May 2015	6,315	48,673
June 2015	6,569	52,168
July 2015	6,675	55,691
August 2015	6,526	59,279
September 2015	7,245	63,317
October 2015	8,209	68,063
TOTAL:	41,539	

### 2.17 COMPLIANCE WITH TITLE V PERMIT CONDITION 19866 (S-42)

The total amount of material received at the S-42 Soil and Cover Stockpiles did not exceed 1,160 tons per day and 105,500 tons per year.

### 2.18 COMPLIANCE WITH TITLE V PERMIT CONDITION 19867, PARTS 6-10

The following is a summary of vehicle activity at the RLI:

- The mean vehicle fleet weight for all off-site vehicles traveling on paved roads was 14.34 tons, which is below the permit limit of 15.31 tons.
  - Mean vehicle fleet weight for all off-site vehicles traveling on gravel or dirt roads was 15.45 tons, which is below the permit limit of 16.63 tons.
  - The mean vehicle fleet weight for all on-site landfilling and construction related vehicles was 11.2 tons, which is below the permit limit of 28.37 tons.
  - During the reporting period, the vehicle miles travelled (VMT) per day on gravel roads did not exceed the permit limit of 280 VMT per day. 2015 partial calendar year VMT on gravel roads was 31,910 VMT, below the limit of 87,080 VMT.
  - During the reporting period, the VMT per day on dirt roads did not exceed the permit limit of 639 VMT per day. 2015 partial calendar year VMT on dirt roads was 85,042 VMT, below the limit of 198,650 VMT.
  - During the reporting period, the VMT per day on paved roads did not exceed the permit limit of 622 VMT per day. 2015 partial calendar year VMT on paved roads was 53,162 VMT, below the limit of 205,880 VMT.
  - During the reporting period, the VMT per day on paved roads for the on-site vehicle fleet did not exceed the permit limit of 61 VMT per day. 2015 partial calendar year VMT on paved roads is 11,557 VMT, below the limit of 19,080 VMT.

The records for VMT and average vehicle fleet weights are available for review at RLI.

### 2.19 COMPLIANCE WITH TITLE V PERMIT CONDITION 19867, PARTS 14 AND 15

No contaminated soil containing volatile organic compound (VOC) concentrations greater than 50 parts per million (ppm) was received during this reporting period. The total VOC emission rate for the reporting period (May 1, 2015 to October 31, 2015) is 0.00 lbs. The VOC soil log is included in Appendix L.

## 2.20 COMPLIANCE WITH TITLE V PERMIT CONDITION 19867, PARTS 31 AND 33

#### WEEKLY H2S MONITORING

Pursuant to Title V Permit Condition Number 19867, Part 31b, weekly hydrogen sulfide (H<sub>2</sub>S) readings were taken using Draeger tubes. The applicable limit is 450 ppm<sub>v</sub> as TRS. The weekly H<sub>2</sub>S readings and quarterly averages are summarized in Appendix M, H<sub>2</sub>S Weekly and Quarterly Monitoring. All samples were below the 450 ppm<sub>v</sub> TRS limit.

#### QUARTERLY H2S CHARACTERIZATION

Pursuant to Title V Permit Condition Number 19867, Part 31a, RLI collected the quarterly characterization of the LFG for analysis of sulfur compounds. The results are included in Tables 2-10 and Appendix M. Both samples had TRS less than the peak limit of 450 ppm<sub>v</sub>.

**Table 2-10 LFG Characterization Results** 

Compound	Second Quarter 2015 Result (ppm <sub>v</sub> ) 6/17/2015	Third Quarter 2015 Result (ppm <sub>v</sub> ) 9/24/2015	Permit Limits (ppm <sub>v</sub> )
Hydrogen Sulfide	88	240	N/A
Carbonyl Sulfide	ND	ND	N/A
Methyl Mercaptan	ND	ND	N/A
Ethyl Mercaptan	ND	ND	N/A
Dimethyl Sulfide	ND	ND	N/A
Carbon Disulfide	ND	ND	N/A
Total Reduced Sulfur	88	240	450

ND = not detected N/A = not applicable

Pursuant to Title V Permit Condition Number 19867, Part 33, RLI submitted a proposal, on May 17, 2011, for monitoring ground level H<sub>2</sub>S concentrations at or near the fence line or property boundary. RLI will initiate H<sub>2</sub>S monitoring within 3 months of approval from the District for the monitoring protocol. As of this Semi-annual reporting period (May 1, 2015 to October 31, 2015), approval from the District has not been received.

### 2.21 COMPLIANCE WITH TITLE V PERMIT CONDITION 22940 (S-56)

Conditions from the California Air Resources Board (CARB) Permit Number 117378 for the S-56 Portable Horizontal Grinder have been incorporated by reference into the RLI Title V Permit. Therefore, the compliance records for this equipment have been included in this Combined Report. Pursuant to BAAQMD Condition Number 22940, the emissions of particulate matter less than 10 microns in diameter (PM<sub>10</sub>) did not exceed 10 tons per year. The maximum daily throughput for the portable horizontal grinder (S-56) did not exceed 820 tons per day or 200,000 tons per year. Monitoring is performed daily when operations are conducted, the recording of total throughput of all registered

equipment units operating. Table 2-11 lists the PM<sub>10</sub> emissions and total throughput of waste processed at S-56 for the reporting period:

Table 2-11 Waste Processed at S-56

	·	~ <del></del>
Month	PM₁₀ Emissions (tons)	Estimated Total Throughput (tons)
May 2015	0.00	0
June 2015	0.00	0
July 2015	0.00	0
August 2015	0.00	0
September 2015	0.00	0
October 2015	0.00	0
TOTAL:	0.00	

#### 2.22 COMPLIANCE WITH TITLE V PERMIT CONDITION 22941 (S-57)

Conditions from the California Air Resources Board (CARB) Permit Number 117376 for the S-57 Portable Diesel Engine have been incorporated by reference into the RLI Title V Permit. Therefore, the compliance records for this equipment have been included in this Combined Report. Pursuant to BAAQMD Condition Number 22941, the diesel fuel usage has not exceeded 72,295 gallons during any consecutive 12-month period. The Daily fuel and operating records are maintained and summarized on a monthly basis. Table 2-12 lists the monthly and rolling 12-month fuel usage for the S-57 Portable Diesel Engine for the reporting period:

Table 2-12 Fuel Usage at S-57

Month	Diesel Fuel Usage (gallons)	Rolling 12-Month Fuel Usage (gallons)		
May 2015	0	0		
June 2015	0	0		
July 2015	0	0		
August 2015	0	0		
September 2015	0	0		
October 2015	0	0		
TOTAL:	0			

### 2.23 COMPLIANCE WITH TITLE V PERMIT CONDITION 23052 (S-58)

Pursuant to Permit Condition 23052 Part 1, the total leachate influent rate to the Aerated Leachate Pond (S-58), excluding non-contact storm runoff, did not exceed 39.42 million gallons during any consecutive 12-month period. The total leachate flow rate to S-58 for each month (gallons/month) and the total cumulative flow rate to S-58 for each rolling 12-month period (millions of gallons/year) were recorded. Table 2-13 displays the leachate flow information for S-58.

Table 2-13 Leachate Flow Information for S-58

Month	Total Leachate Influent Rate to S-58 (gallons)	Total Rolling 12-Month Flow Rate to S-58 (millions of gallons)
May 2015	2,173,822	30,984,058
June 2015	1,755,401	30,967,974
July 2015	1,907,234	31,882,337
August 2015	1,479,576	31,635,031
September 2015	2,368,449	32,542,737
October 2015	1,907,370	33,142,052
TOTAL:	11,591,852	•••

The average concentration of precursor organic compounds (POCs) in the leachate influent to S-58 did not exceed 500 parts per billion (pp<sub>b</sub>) by weight as required by Title V Permit Condition Number 23052 Part 2. The average concentrations of specified toxic air contaminants in the leachate influent to S-58 did not exceed 19 ppb by weight of benzene, 48 pp<sub>b</sub> by weight of 1,4-dichlorobenzene, and 7 pp<sub>b</sub> by weight of vinyl chloride as required by Title V Permit Condition Number 23052, Part 3. Table 2-14 summarizes POC concentrations in the influent to S-58.

**Table 2-14 POC Concentrations for S-58** 

Date	Benzene (ppb)	1,4-Dichlorobenzene (ppb)	Vinyl Chloride (ppb)	Total POC Concentration (ppb)
June 4, 2015	4.9	5.75	ND<0.5	40.75

# 2.24 COMPLIANCE WITH TITLE V PERMIT CONDITION 24527 (S-61 AND S-62)

The S-61 Portable Diesel Engine for Waste Tipper and S-62 Portable Diesel Engine for Power Screens operated less than 4,992 hours combined during any 12-month period ending in the May 1, 2015 to October 31, 2015 reporting period. Table 2-15 displays runtime hours for S-61 and S-62 during the reporting period.

Table 2-15 S-61 and S-62 Portable Diesel Engines

Month	S-61 Total Runtime (Hours)	S-62 Total Runtime (Hours)	Combined Rolling 12- Month Total (Hours)
May 2015	32	0	276
June 2015	31	1	291
July 2015	26	5	301
August 2015	20	10	307
September 2015	22	0	307
October 2015	27	0	307
TOTALS:	174	0	

#### 4 START-UP, SHUTDOWN, MALFUNCTION REPORT

Start-up, Shutdown, Malfunction (SSM) Report for the Collection and Control Systems at the Redwood Landfill

The NESHAP contained in 40 CFR Part 63, AAAA for MSW landfills to control hazardous air pollutants include the regulatory requirements for submittal of a semi-annual report (under 40 CFR §63.10(d)(5) of the general provisions) if an SSM event occurred during the reporting period. The reports required by 40 CFR §63.1980(a) of the NESHAP and §60.757(f) of the NSPS summarize the GCCS exceedances. These two semi-annual reports contain similar information and have been combined as allowed by 40 CFR §63.10(d)(5)(i) of the General Provisions.

NESHAP 40 CFR Part 63, AAAA became effective on January 16, 2004. SSM events that occurred during the semi-annual reporting period (May 1, 2015 to October 31, 2015) are noted in this section and included in Appendix B. The following information is included as required:

- During the reporting period, 4 A-51 Flare SSM events, 10 A-60 Flare Zone A SSM events, and 1 A-60 Flare Zone B SSM events occurred. The time, duration, and cause of each event are included in Appendix B, Flare SSM Logs.
- During the reporting period, 36 wellfield SSM events occurred. The time and duration of these events are included in Appendix D, Wellfield SSM Log.
  - During the reporting period, 0 monitoring/recorder equipment SSM event occurred.
  - In all 51 flare and wellfield SSM events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan.
  - Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required nor prepared (§63.6(e)(3)(viii)).